

**Honeywell**  
101 Constitution Ave NW  
Washington, DC 20001

August 22, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: Expanding Access to Broadband and Encouraging Innovation through Establishing an Air-Ground Mobile Broadband Secondary Service for Passengers Aboard Aircraft in the 14.0-14.5 GHz Band; GN Docket No. 13-66; RM-11640**

Dear Ms. Dortch:

Honeywell supports the Federal Communications Commission ("FCC") proposal to create a new Air-Ground Mobile Broadband service operating on a secondary basis at 14.0 to 14.5 GHz. This new and much-needed service will help air carriers to meet air travelers' growing need for in-flight mobile broadband connectivity.

Honeywell is a leader in providing aircraft communication systems for use by the crew and the passengers to ensure safe operation of the aircraft and provide information and entertainment to passengers. We have a long legacy of providing satellite-based communications systems to aircraft, both at L-Band and Ku-band. Honeywell's subsidiary, EMS Aviation, through its facility in Moorestown, New Jersey, provides the majority of the avionics that is used to support U.S. airlines' use of Aircell's GoGo air-ground service, which operates in the UHF band. Our customers demand high quality service, and we believe that the tremendous capacity of this new service will offer increased quality of service without interfering with existing services.

Honeywell is finding that air travelers increasingly need to have in-flight broadband access that is comparable to the access that they have on the surface of the earth given that full anywhere/anytime use of portable electronic devices (like smartphones, tablets, and e-readers) is an important part of their personal and business lives. For this reason, Honeywell is particularly pleased that the FCC has proposed this new air-ground broadband service on-board aircraft because it can provide the necessary level of connectivity.

As the FCC explains in the Notice of Proposed Rulemaking, the Air-Ground Mobile Broadband service will successfully co-exist with existing satellite operations in the 14.0 to 14.5 GHz band through implementation of advanced equipment designs and smart spectrum management techniques that will successfully share the band with existing services. Moreover, Honeywell is hopeful that the lengthy FCC record developed via the Qualcomm Petition for Rulemaking will allow the FCC to rapidly approve this much-needed service.

For all these reasons, Honeywell encourages the FCC to follow through on the proposals set forth in the Notice of Proposed Rulemaking and establish the new Air-Ground Mobile Broadband Service at 14.0 to 14.5 GHz as soon as possible.

Sincerely,



Chris Benich  
Vice President, Aerospace Regulatory Affairs